



New-Indy Catawba LLC
Catawba, South Carolina
Operating Procedures

Pursuant to Paragraph 52(c)(i) of the May 13, 2021 EPA Order ("Order"), New-Indy Catawba LLC ("New-Indy") provides its procedures ("Revised Final Remedial Plan") for operating the Catawba Mill to meet the hydrogen sulfide ("H₂S") concentration specified in Paragraph 52(b). New-Indy provided supporting documentation on a ShareFile site referenced in the May 18, 2021 cover letter that accompanied the proposed Remedial Plan, in the May 24, 2021 cover letter that accompanies the Final Remedial Plan, and in the May 25, 2021 cover letter that accompanies the Revised Final Remedial Plan.

As New-Indy has indicated previously, New-Indy installed three continuous H₂S monitoring stations at and around the Catawba Mill in April 2021 to begin measuring levels of H₂S. New-Indy continues to be encouraged that the initial data from the monitoring stations at New-Indy's property boundary indicate H₂S concentrations are well below the concentrations identified in Paragraph 52(b) of the Order. New-Indy proposes to continue to meet the H₂S concentrations specified in Paragraph 52(b) by complying with the conditions in New-Indy's applicable air permits (provided on the ShareFile site) and New-Indy's NPDES permit (provided on the ShareFile site). Specifically, New-Indy has restarted its steam stripper and submitted to SC DHEC its Notice of Intent to Conduct Performance Testing and test protocol to comply with 40 CFR 63, Subpart S on May 17, 2021.

Additionally, the wastewater treatment plant is operated pursuant to the NPDES permit and operations plans. Those operations plans were provided on the ShareFile site. New-Indy is in the process of revising the O&M Manual and Odor Abatement plan in accordance with its new operations that began in February 2021. DHEC's May 7, 2021 Order requires a comprehensive evaluation of New-Indy's wastewater treatment plant. This is in process. New-Indy is actively removing fiber from the aerated stabilization basin ("ASB") and is completing additional repairs to the ASB that include the following activities:

- a. Aerator repairs are being made to increase oxygenation of wastewater throughout the ASB, with a focus on achieving this in the first biological zone of the ASB.
- b. Subsurface dredging continues as an ongoing and regular maintenance activity to maintain effective treatment volume (residence time) in the ASB.
- c. Environmentally friendly (water-soluble, non-toxic) chemical additions are being made to the ASB to "boost" oxygen transfer rates until the first zone aerators can be brought back into operation (*i.e.*, calcium nitrate, or peroxide, or liquid oxygen, or combination, etc.). Removal of surface fiber is required to gain access to the aerators in this zone.
- d. Optimization of influent pH control continues for the wastewater entering the ASB.

New-Indy also provided an Executive Summary of its draft Quality Assurance Monitoring Plan ("QAPP") for the operation of the ambient monitors in accordance with paragraph 52(c)(ii) of the Order with the May 18, 2021 cover letter that accompanied the proposed Remedial Plan and with the May 24, 2021 cover letter that accompanied the Final Remedial Plan. New-Indy provides a full draft QAPP with the Revised Final Remedial Plan. The full draft QAPP includes supporting documentation in the form of equipment user manuals and standard operating procedures. New-Indy will include feedback from EPA in the final QAPP and provide it to EPA for final approval. Further, New-Indy has provided plans for addressing safety procedures, shutdown procedures, and access restrictions while work is performed on the ambient monitors (provided on the ShareFile site).

New-Indy is running the steam stripper at maximum capacity, and only excess flow is processed through the hard pipe. Flow rates are monitored to ensure this condition is met. New-Indy intends to continue operating the stripper at maximum capacity at this time. This operating strategy minimizes the flow of foul condensate to the ASB hard pipe. This Revised Final Remedial Plan addresses New Indy's efforts to reduce odor emissions. With assistance from the OEM supplier, New-Indy is investigating options to reduce the amount of foul condensate being sent to the ASB, including maximizing the steam stripper's foul condensate stripping capacity.